

MICHAEL P. WALLS

VICE PRESIDENT

REGULATORY & TECHNICAL AFFAIRS

January 3, 2017

Mr. James Jones (7101M) Assistant Administrator U.S. Environmental Protection Agency William Jefferson Clinton Building 1200 Pennsylvania Avenue, N.W. Washington, DC 20460

Re: Request for Extension of Comment Period Regarding the Nominations to the Science Advisory Committee on Chemicals, EPA-HQ-OPPT-2016-0713

Dear Jim:

The American Chemistry Council (ACC) requests that EPA extend by 30 days the public comment period on nominees to serve on the Science Advisory Committee on Chemicals (SACC) established by the Frank R. Lautenberg Chemical Safety for the 21st Century Act's (LCSA). The SACC will serve a very important advisory role to EPA under the LCSA, including providing independent advice and expert consultation regarding the scientific and technical aspects of issues relating to the Toxic Substances Control Act. As such, stakeholders should have sufficient time to evaluate and comment on the qualifications, expertise, balance, and potential biases of those nominated to serve on the SACC.

EPA currently has pending a number of LCSA regulatory proposals on which ACC is coordinating and developing comments – with several more expected to be released by the Agency in the coming weeks. In combination with the recent holidays, the short comment period on SACC membership creates challenges for providing the most constructive and effective public comment.

ACC also requests that, in addition to extending the comment period, EPA provide a public explanation why only 29 individuals were selected by EPA as potential candidates, when at least 96 individuals were nominated to serve. Given the broad scope of the LCSA's new requirements, EPA should explain why it intends to limit membership on the SACC to only 14 members, as well as the apparent predisposition to select nine of the ten individuals who served on the Chemical Safety Advisory Committee (CSAC) for SACC membership. All stakeholders will benefit from greater transparency by EPA on its selection criteria for this critical science advisory committee.



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Thank you for your consideration of this request for an extension to the comment period on the nominees to serve on the SACC.

Sincerely,

Michael P. Walls

Vice President

Regulatory & Technical Affairs

CC: Wendy Cleland-Hamnett

Stan Barone Steven Knott Jim Laity